

## Exhibit 169

Plaintiffs' Corrected Averment of Jurisdictional Facts and  
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank  
Pursuant to Rule 56.1

Saudi Arabian Monetary Authority  
Head Office: Riyadh

Banking Inspection Division  
No. 16603/M.A.T./6969

Date: 09/06/1423 AH  
Corresponding: (November 11, 2002 AD)  
Attachments:

Confidential/Urgent

His Excellency Director General  
Al Rajhi Banking & Investment Corp.  
General Management – Riyadh

Greetings,

We have information that Omar Ahmed Mostafa al Bayoumi, a Saudi citizen according to Personal ID No. 14, had received some remittances at his Bank of America account from Saudi American Bank. The information about remittances is as follows:

Following is a list of wire transfers involving Al-Bayoumi:

- 1- Sending Bank: Al-Rajhi Banking & Investment Co.  
Date: February 9, 1999  
Amount: \$4,985.00 (US)  
Sender's reference #: [REDACTED]-39JS  
Possible Account #: [REDACTED]-7794
- 2- Sending Bank: Al-Rajhi Banking & Investment Co.  
Date: April 17, 2001  
Amount: \$5,314.00 (US)  
Sender's reference #: [REDACTED]-05FS  
Possible Account #: [REDACTED]-7794
- 3- Sending Bank: Al-Rajhi Banking & Investment Co.  
Date: April 17, 2001  
Amount: \$12,985.00 (US)  
Sender's reference #: [REDACTED]-98JS  
Possible Account #: [REDACTED]-7794

[SEAL: Internal Audit Division]

CONFIDENTIAL: This document is subject to a Protective Order regarding confidential information in 03 MDL 1570 (GBD) (SN), United States District Court for the Southern District of New York

ARB-00013754

Saudi Arabian Monetary Authority  
Head Office: Riyadh

Banking Inspection Division  
No.

Date:  
Corresponding:  
Attachments:

Requirements:

- 1- Obtain all available information regarding the bank accounts from which AL-Bayoumi received the wire transfers. That information should include:
  - A. Details of the wire transfers.
  - B. Name and biographical information on the account holders>
  - C. Other accounts into which the account holder wire transferred money.
  - D. The source of the money in the account (salary, donations, deposited from other person....ext).
  - E. Copies of deposit items, checks written, other wire transfers.
  - F. Signature cards,
  - G. Other related accounts.
  - H. Credit, debit, and teller machine cards associated with the accounts.

Kindest regards,  
Director of Banking Inspection Division  
Ali bin Mohamed al Ghaith  
[Handwritten Signature]

CONFIDENTIAL: This document is subject to a Protective Order regarding confidential information in 03 MDL 1570 (GBD) (SN), United States District Court for the Southern District of New York

ARB-00013755

## مؤسسة النقد العربي السعودي

المكتب الرئيسي - الرياض

إدارة التفتيش (التحقيق)

الرقم: ١٦٦٠٣ / ١٤٢١ / ٦٩٦٩

التاريخ: ٢٠١٢ / ١٤٢٢

الموافق:

المرفقات:

سري/عاجل

المحترم

سعادة المدير العام

شركة الراجحي المصرفية للاستثمار

الإدارة العامة - الرياض

بعد التحية،

توفرت لدينا معلومات بأن المدعو/ عمر أحمد مصطفى البيومي سعودي الجنسية بموجب بطاقة أحوال رقم ١٠٣٦٦٣٩٥١٤ قد تلقى عدة حوالات برقية مالية على حسابه في بنك أمريكا من البنك السعودي الأمريكي. المعلومات عن الحوالات كالآتي:

Following is a list of wire transfers involving Al-Bayoumi:

- |    |                       |                                   |
|----|-----------------------|-----------------------------------|
| 1- | Sending Bank:         | Al-Rajhi Banking & Investment Co. |
|    | Date:                 | February 9, 1999                  |
|    | Amount:               | \$4,985.00 (US)                   |
|    | Sender's reference #: | [REDACTED]-39JS                   |
|    | Possible Account #:   | [REDACTED]-7794                   |
| 2- | Sending Bank:         | Al-Rajhi Banking & Investment Co. |
|    | Date:                 | April 17, 2001                    |
|    | Amount:               | \$5,314.00 (US)                   |
|    | Sender's reference #: | [REDACTED]-05FS                   |
|    | Possible Account #:   | [REDACTED]-7794                   |
| 3- | Sending Bank:         | Al-Rajhi Banking & Investment Co. |
|    | Date:                 | April 17, 2001                    |
|    | Amount:               | \$12,985.00 (US)                  |
|    | Sender's reference #: | [REDACTED]-98JS                   |
|    | Possible Account #:   | [REDACTED]-7794                   |



مؤسسة النقد العربي السعودي

المركز الرئيسي للترتيبات

إدارة التفتيش البنكي

التاريخ :  
الموافق :  
المرفقات :

الرجاء

## Requirements:

- 1- Obtain all available information regarding the bank accounts from which AL-Bayoumi received the wire transfers. That information should include:
  - A. Details of the wire transfers.
  - B. Name and biographical information on the account holders>
  - C. Other accounts into which the account holder wire transferred money.
  - D. The source of the money in the account (salary, donations, deposited from other person....ext).
  - E. Copies of deposit items, checks written, other wire transfers.
  - F. Signature cards,
  - G. Other related accounts.
  - H. Credit, debit, and teller machine cards associated with the accounts.

وتقبلوا تحياتي ، ، ،

مدير إدارة التفتيش البنكي  
علي بن محمد الغيث



## TRANSLATION CERTIFICATION STATEMENT

**Project:** 20230811VGC

**Language:** Arabic > English

**Document title:** ARB 13754-13755

### TRANSLATOR STATEMENT

I hereby declare that, to the best of my knowledge and belief, the translation of the above referenced documents is a true, accurate and complete translation of the original.

**Name of Certifying Translator:** Farah Alshekhli

**Qualifications:** BA in Translation and Interpretation Studies, 17 years of experience, certified

**Signed:** *Farah Alshekhli*

**Date:** 09/25/2023